IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

In Re:	)	
	)	
GEORGE ESAF SHAHEEN,	)	Case No. 11-31102-KRH
	)	
Debtor	)	Chapter 7
	)	
LYNN L. TAVENNER, Ch 7 Trustee,	)	
	)	
Plaintiff	)	
	)	
	)	
v.	)	Adversary Proceeding
	)	No. 13−03036-KRH
GLORIA DEAN SHAHEEN,	)	
	)	
Defendant	)	

MOTION FOR EXPEDITED HEARING ON MOTION FOR
LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANT

William R. Baldwin, III, individually and for the firm of Marchant, Thorsen, Honey, Baldwin & Meyer, LLP, under Local Rule 2090-1(H) and under Virginia Rule of Professional Conduct 1.16, respectfully moves the Court to set an expedited hearing on the pending motion of the undersigned for leave to withdraw as counsel for the Defendant in this Adversary Proceeding No. 13−03036-KRH, styled Lynn L. Tavenner, Trustee v. Glorida Dean Shaheen (the "Adversary Proceeding") case. The undersigned also has moved for leave to withdraw as counsel for Debtor George Shaheen ("Mr. Shaheen") in the underlying Bankruptcy Case, and as cause represents:

1. There are matters pending in the Adversary Proceeding, *e.g.*, trial set for October 22, 2013 at 10:00 a.m. and hearing on the Trustee's Motion for Summary Judgment in this cause

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Counsel for the Defendant

set for October 9, 2013 at 11:30 a.m. Additionally, there is outstanding discovery to which as response is required and as to which the undersigned has requested an extension so that, if the requested relief is granted, the Defendant's new counsel will have the opportunity to become familiar with the matters at issue in this proceeding and provide appropriate advice to the Defendant in responding to the pending discovery.

2. Hearing on the motion to withdraw as counsel in the Bankruptcy Case should occur at the same time as a matter of judicial economy; although there are no deadlines or hearings scheduled in the Bankruptcy Case, since the issues in counsel's requested withdrawal are substantially identical it is appropriate that both matters be heard at the same time. Accordingly, if the Court deems an expedited hearing to be proper on the motion to withdraw in the Adversary Proceeding the same result should apply to the motion to withdraw in the Bankruptcy Case.

3. Under Local Rule 9013-(N) the undersigned certifies that he has:

> (1) has carefully examined the matter and concluded that there is a true need for an expedited hearing;
> (2) has not created the emergency through any lack of due diligence; and
> (3) has made a *bona fide* effort to resolve the matter without hearing to the extent the same is permissible under applicable Rules of Professional Conduct (matters relating to counsel's withdrawal from a pending proceeding or case are reserved to the Court and cannot be negotiated by the parties).

4. October 9, 2013 at 11:30 a.m. is available to the Court to consider this motion and the undersigned requests that the Court consider this motion at that time.

5. Because of the short notice, the undersigned requests that the Court allow a written response from the Defendant at any time prior to the hearing herein.

WHEREFORE, premises considered, William R. Baldwin, III and the firm Marchant, Thorsen, Honey, Baldwin & Meyer, LLP prays that the Court grant an expedited hearing on the motion of William R. Baldwin, III and the firm Marchant, Thorsen, Honey, Baldwin & Meyer, LLP to withdraw as counsel for the Defendant in this proceeding, such hearing to take place October 9, 2013 at 11:30 a.m., and that the Court grant other proper relief.

WILLIAM R. BALDWIN, III
MARCHANT, THORSEN, HONEY, BALDWIN & MEYER, LLP

Dated: October 5, 2013 By: /s/ W. R. Baldwin, III

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Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing was served by Electronic Filing on October 5, 2013 on party participants in the ECF system in effect herein, to include:

Loc Pfeiffer, Esq.
(loc.pfeiffer@kutakrock.com)
Jeremy S. Williams, Esq.
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Kutak Rock LLP
1111 East Main Street, Suite 800
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and by first class mail (October 5, 2013) postage prepaid and email (October 5) to:

Gloria Dean Shaheen
Email: c/o (georshah@aol.com)
786 Cedar Run Trail
Manakin-Sabot, VA 23103

/s/ W. R. Baldwin, III